

Compliance Assessment Report CAR_NRW0041710

Permit being assessed: VP3794FN.

For: A S H Bretton Recycling Centre, held by Alan's Skip Hire Limited

At: Broughton Mill Road, Bretton, Flintshire, CH4 0BY.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 18/04/2023 between 14:15 and 14:50.

Parts of permit assessed: Management System & Operating Procedures, Reporting to Natural Resources Wales, Waste Acceptance, Storage, Handling, Labelling & Segregation, Staff Competency, Dust/Fibres

NRW Lead Officer: Sarah Walton.

Report sent to: Thomas Farrell, Group Environmental Compliance Manager on 28/04/2023.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C1 - General Management - Staff competency/training	Action only (X)	
C2 - General Management - Management system and operating procedures	Action only (X)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
C1	Please provide a copy of the site's certificate of technical competence.	12/05/2023
C2	Please ensure all staff overseeing site operations, are trained in the location and use of the Environmental Management	12/05/2023

Criteria	Action needed	Complete by
	System and Fire Prevention & Mitigation Plan.	

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

A routine site inspection took place on Tuesday 18th April 2023.

Waste Regulation Officer, Sarah Walton, met with Health and Safety Manager, Nicole Davies and Site Manager, Melanie Morris.

The inspection began with a walk around site and discussions about how site had been operating since the previous visit.

The weather was sunny and breezy. There was no evidence of any dust at the time of the inspection and there was water on the ground showing site had been dampening down that day. No complaints of dust have been received by the site in recent months.

Prior to the site inspection, a review of waste returns took place. This found that the site accepted 30,686 tonnes of waste across 2022.

There were no issues with the waste types or quantities noted in the returns.

Thank you for submitting the returns in line with permit requirements.

The exempt area of the site was discussed. The site currently has a T11 Waste Exemption for the treatment of Waste Electrical & Electronic Equipment (WEEE). However, the site is not currently treating this waste. Instead WEEE is stored and bulked for onward recovery. Please note that there some upcoming reforms to the waste regime which will affect your operations.

As part of the reform, an exempt waste operation can no longer be carried out on or adjacent to a permitted waste site.

Please see the below link for further information:

<https://www.gov.uk/government/consultations/reducing-crime-at-sites-handling-waste-and-introducing-fixed-penalties-for-waste-duty-of-care/outcome/supplementary-government-response#technical-changes-to-exemptions>

As a walk around site progressed, the site was generally clean and tidy with clearly designated areas.



Photograph showing recycling building

The above photograph shows the storage of cardboard and plastics. These materials are baled on site prior to being moved off site.

**Photograph showing Mixed Waste Treatment building**

The site had a steady flow of incoming wastes. Skips come into site and tip in the middle of the building. This waste is sorted using a grabber, before being put through a picking line. The residual waste is then put through the BlueMAC fines separator. This sorts the waste into various different sized fines.

The machine was fully operational and there was no stockpiling of fines at the time of inspection.

Once a walkaround had been completed, a selection of Waste Transfer Notes were viewed in the site office. These documents were fully completed with LoW codes and written descriptions of waste types.

A copy of the site EMS and FPMP were requested, however site staff did not know where to access these documents.

ACTION: please ensure all staff overseeing site operations, are trained in the location and use of the Environmental Management System and Fire Prevention & Mitigation Plan. These documents should be readily available and staff should be aware of the requirements.

It is noted that ASH are part of the EU Skills scheme for technical competence.

ACTION: Please provide a copy of the site's certificate for technical competence.

Thank you to all staff who assisted with the inspection.

Should you wish to discuss anything in this report, please make contact using the details below.

Kind Regards,

Sarah Walton

Waste Regulation Officer

Email: Sarah.I.walton@cyfoethnaturiolcymru.gov.uk

Post: Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law
- assessing customer service satisfaction and improving our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.